



UNITED STATES ANIMAL HEALTH ASSOCIATION

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December 20, 2005

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United States Department of Health and Human Services
Food and Drug Administration
Division of Dockets Management (HFA-305)
5630 Fishers Lane
Room 1061
Rockville, MD 20852

BRET D. MARSH
PRESIDENT
INDIANA STATE BOARD OF
ANIMAL HEALTH

RE: Docket No. 2002N-0273; Substances Prohibited From Use in Animal Food
or Feed

LEE M. MYERS
PRESIDENT-ELECT
GEORGIA DEPARTMENT OF
AGRICULTURE

Dear Sir or Madam,

The United States Animal Health Association (USAHA) this nation's premier animal health forum is a science-based, voluntary organization of official state and federal animal health agencies, national allied organizations, regional representatives and individual members founded to protect animal and public health. USAHA serves as a forum for communication and coordination among state and federal governments, universities, industry and other groups on issues of animal health and disease control, animal welfare, food safety and public health.

JAMES W. LEAFSTEDT
FIRST VICE-PRESIDENT
NATIONAL PORK BOARD

The content of the proposed rule was discussed by USAHA's membership during its 109th Annual Meeting last month in Hershey, Pennsylvania. Resolution 2 was approved and specifically addressed this issue. The resolution reads as follows:

DONALD E. HOENIG
SECOND VICE-PRESIDENT
MAINE DEPARTMENT OF
AGRICULTURE

"The United States Animal Health Association (USAHA) urges the Food and Drug Administration (FDA), Center for Veterinary Medicine (CVM) to more thoroughly evaluate the unintended consequences of changes in the Ruminant Feed Rule so that reducing a very small risk from Bovine Spongiform Encephalopathy (BSE) does not lead to a carcass disposal crisis in many areas of the United States."

RICHARD E. BREITMEYER
THIRD VICE-PRESIDENT
CALIFORNIA DEPARTMENT OF
FOOD AND AGRICULTURE

While the membership of USAHA supports efforts to reduce the risk of BSE in the United States, there is concern that the proposed rule could cause significant economic and environmental harm, reduces disease surveillance opportunities as well as threaten the health of people and animals from a number of pathogens that can be spread by the inappropriate disposal of dead animals.

WILLIAM L. HARTMANN
TREASURER
MINNESOTA BOARD OF
ANIMAL HEALTH

We appreciate the opportunity to comment on this proposed rule.

J LEE ALLEY
SECRETARY

Sincerely,

Bret D. Marsh, DVM
President

02N-0273

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